



*United States Attorney
Southern District of New York*

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June 23, 2017

BY ECF

The Honorable Richard M. Berman
United States District Judge
United States District Court for the
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States of America v. Todd Howe*, 16 Cr. 632 (RMB)

Dear Judge Berman:

The Government writes in response to the letter filed by defendant Todd Howe on June 19, 2017, requesting that he be granted permission to transfer his residence from Washington, D.C. to Idaho, and to travel to the District of Idaho to effect that move. Based on the Government's conversations with defense counsel, it is the Government's understanding that Howe moved from Washington, D.C. to Idaho in or about mid-April 2017. While Howe did not seek permission from the Court prior to his move, his counsel had previously informed the Government that Howe was considering moving away from Washington, D.C. and the Government indicated that it would not object to a request from Howe to the Court to change his district of residence.

The Government continues to have no objection to Howe's move (although it now has already occurred). In addition, based on conversations with the Pretrial Services Office for the Southern District of New York (the "Pretrial Office"), we understand that the Pretrial Office also has no objection to Howe's request to transfer his supervision to the District of Idaho. According to the Pretrial Office, Howe has otherwise been in compliance with the conditions of his release. Howe's counsel has provided the Pretrial Office with Howe's home address in Idaho, telephone number, and email address, as well as his place of employment.

Respectfully submitted,

JOON H. KIM
Acting United States Attorney

By: _____/s/_____
Janis Echenberg/Robert Boone/
David Zhou/Matthew Podolsky
Assistant United States Attorneys
Southern District of New York

cc: Richard Morvillo, Esq.
Stuart Pierson, Esq.